

**From:** Chuck Howell  
**To:** Microsoft ATR  
**Date:** 1/25/02 10:51am  
**Subject:** Microsoft Settlement

I am concerned about two aspects of the the proposed remedy that in my opinion do not go far enough to foster true competition in the public interest.

The PFJ's overly narrow definitions of "Microsoft Middleware Product" and "API" means that Section III.D.'s requirement to release information about Windows interfaces would not cover many important interfaces.

No part of the PFJ obligates Microsoft to release any information about file formats, even though undocumented Microsoft file formats form part of the Applications Barrier to Entry (see "Findings of Fact" ¶20 and ¶ 39).

Required full disclosure of APIs (including so called "hidden" APIs used by Microsoft products) and of file formats would enable third party developers to better integrate with Microsoft applications, leading to true competition in operating systems.

Sincerely,

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I am a U.S. Citizen.